

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FTX TRADING LTD., <i>et al.</i> ¹)	Case No. 22-11068 (JTD)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 481

**DECLARATION OF ALEX VAN VOORHEES IN SUPPORT OF THE
APPLICATION FOR AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF FTI CONSULTING, INC. AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Pursuant to 28 U.S.C. section 1746, Alex van Voorhees declares as follows:

1. I am a representative of GGC International Ltd, a member of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”). GGC International Ltd was selected as co-chair of the Committee.
2. I submit this declaration (the “Declaration”) in further support of the Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 22, 2022 [Docket No. 481] (the “Application”).² Except as otherwise noted herein, the facts set forth herein are based on my personal knowledge and belief.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used herein shall have meanings ascribed to them in the Application or in the Reply to the U.S. Trustee’s objection to FTI’s Application..

3. On December 15, 2022, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) filed the *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 231], and on December 20, 2022, the U.S. Trustee filed the *Amended Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 261].

4. On December 22, 2022, the Committee interviewed six financial advisors (including FTI Consulting, Inc. (“FTI”)), before ultimately selecting FTI as its financial advisor.

5. The Committee selected FTI because of its multi-dimensional expertise across Fintech, crypto, forensics, investigative and restructuring practice areas, its extensive experience representing official creditors’ committees in bankruptcy proceedings, and its ability to manage chapter 11 cases as large and complex as these.

6. FTI disclosed its retention as financial advisor for the official committee of unsecured creditors in Voyager’s chapter 11 cases (the “Voyager Committee”) at the time it presented its qualifications to the Committee.

7. As noted above, FTI’s experience in the crypto-restructuring space was a favorable factor in its selection by the Committee because of the many novel legal and factual issues that arise in the crypto-related bankruptcy cases.

8. The Committee understood and consented to FTI’s concurrent representation of the Committee in these Chapter 11 Cases and the Voyager Committee in light of FTI’s recusal from any disputes arising between the FTX and Voyager estates (the “Recusal Matters”).

9. In the event that FTI is required to recuse itself from Recusal Matters, the Committee’s investment banker, Jefferies LLC, has agreed to provide any necessary financial assistance to the Committee on such issues.

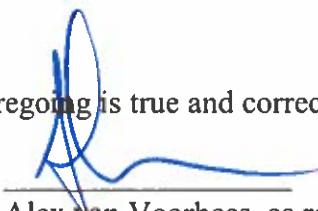
10. In light of FTI's agreement to recuse itself from any Recusal Matters, the Committee does not believe that FTI's concurrent representation of the Committee in these Chapter 11 Cases and the Voyager Committee has or will impair or prejudice FTI's ability to impartially advise the Committee on all other matters related to these Chapter 11 Cases.

11. FTI's retention as financial advisor to the Committee is critically necessary to facilitate the Committee's exercise of its fiduciary duties and to ensure that the Committee's interests are protected in these Chapter 11 Cases.

12. I believe that the denial of the Application would result in substantial costs to the Debtors' estates and would significantly prejudice the Committee's efforts in these Chapter 11 Cases.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2023
New York, New York


Alex van Voorhees, as representative of GGC
International, solely in its capacity as Co-Chair of
the Official Committee of Unsecured Creditors